

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LINDA SUE SEXTON and MICHAEL SEXTON,

Plaintiffs,
v.

HON. MARK A. GOLDSMITH
Case No. 2:19-cv-12574-MAG-APP

LARRY LYNN DUNN, THOMAS
CERNUTO, REDFORD CHARTER
TOWNSHIP, a municipal corporation,
jointly and severally,

**DEFENDANT THOMAS
CERNUTO'S EXHIBIT LIST**

Defendants.

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DEFENDANT THOMAS CERNUTO'S EXHIBIT LIST

NOW COMES Defendant Thomas Cernuto (“Defendant Cernuto”), by and through his attorneys, KELLER THOMA, P.C., for his Exhibit List, states as follows:

1. Records from the following entities:
 - a. Redford Township;
 - b. 17th District Court;
 - c. Wayne County’s Prosecutor’s Office;
 - d. Wayne County (3rd) Circuit Court;
 - e. Michigan State Police;
 - f. Any and all past and present employers of Plaintiff Linda Sexton;
 - g. Any and all past and present employers of Plaintiff Michael Sexton;
 - h. Any and all health professionals, insurers, and/or providers who have been involved in the health care, diagnosis, treatment, testing, and/or evaluation of Plaintiff Linda Sexton, including but not limited to, doctors, therapists, psychologists, social workers, physician assistants, nurses, laboratory personnel or others;
 - i. Any and all health professionals, insurers, and/or providers who have been involved in the health care, diagnosis, treatment, testing, and/or evaluation of Plaintiff Michael Sexton, including but not limited to, doctors, therapists, psychologists, social workers, physician assistants, nurses, laboratory personnel or others.
2. Any and all documents produced by parties to this litigation by way of response to request for production, interrogatories, or otherwise.

3. All documents produced in response to subpoenas issued by any parties.

4. Any document produced in response to a request made pursuant to Michigan's Freedom of Information Act, MCL § 15.231 *et seq.*

5. Any and all exhibits to any depositions taken in this litigation.

6. Demonstrative exhibits to be identified.

7. All deposition transcripts.

8. Expert CV's and/or reports to be identified as well as any and all materials relied upon by any experts.

9. Any and all exhibits listed on Plaintiffs' Exhibit List.

10. Any and all exhibits listed on Defendant Redford Township's Exhibit List.

11. Any and all exhibits listed on Defendant Dunn's Exhibit List.

12. Any and all exhibits that become known through further investigation and discovery.

13. Any exhibits to be used for rebuttal.

14. Defendant Cernuto reserves the right to add further exhibits as they become known through discovery.

Respectfully submitted,

KELLER THOMA, P.C.

By: /s/ Kathryn E. Jones
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Dated: February 28, 2020

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2020, I electronically filed the foregoing paper, ***Defendant Thomas Cernuto's Exhibit List***, with the Clerk of the Court using the ECF system which will send notification to all counsel of record.

By: /s/ Kathryn E. Jones
Kathryn E. Jones (P75431)